

1 James C. Bastian, Jr. – Bar No. 175415  
2 Ryan D. O'Dea – Bar No. 273478  
3 **SHULMAN BASTIAN LLP**  
4 100 Spectrum Center Drive, Suite 600  
5 Irvine, California 92618  
6 Telephone: (949) 340-3400  
7 Facsimile: (949) 340-3000  
8 Email: [Jbastian@shulmanbastian.com](mailto:Jbastian@shulmanbastian.com)  
9 [Rodea@shulmanbastian.com](mailto:Rodea@shulmanbastian.com)

10 Attorneys for Interested Party,  
11 Michael J. Avenatti

12 **UNITED STATES DISTRICT COURT**  
13 **CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES DIVISION**

14 **In re**

15 **EAGAN AVENATTI, LLP,**

16 **Debtor.**

Case No. 8:18-cv-01644-VAP-KES

**LIMITED OBJECTION TO  
RECEIVER'S MOTION TO  
DISCHARGE RECEIVER [Dkt. No. 106]**

**PLEASE TAKE NOTICE** that Mr. Avenatti has no objection to the discharge of the Receiver, but requests that any determination of compensation (or the “reasonableness” of said compensation) to be paid to the Receiver be adjudicated solely by the Bankruptcy Court in light of the recent bankruptcy filing. Mr. Avenatti specifically reserves any and all rights, objections, and/or arguments in opposition to the reasonableness of fees, expenses, and/or compensation sought by the Receiver. Furthermore, Mr. Avenatti objects to the fees requested by the Receiver, as he does not believe the fees (or the attendant services rendered) benefitted the estate.

**SHULMAN BASTIAN LLP**

Dated: October 18, 2019

By: /s/ Ryan D. O'Dea  
Ryan D. O'Dea  
Attorneys for Michael J. Avenatti

**PROOF OF SERVICE**

**In re Eagan Avenatti, LLP  
8:18-cv-01644-VAP-KES**

**STATE OF CALIFORNIA, COUNTY OF ORANGE**

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Orange, State of California. My business address is 100 Spectrum Center Drive, Suite 600, Irvine, CA 92618.

On October 18, 2019, I served true copies of the following document(s) described as **LIMITED OBJECTION TO RECEIVER'S MOTION TO DISCHARGE RECEIVER [Dkt. No. 106]** on the interested parties in this action as follows:

**SEE ATTACHED SERVICE LIST**

**BY MAIL:** I enclosed the document(s) in a sealed envelope or package addressed to the persons at the addresses listed in the Service List and placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with the practice of Shulman Hodges & Bastian LLP for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid. I am a resident or employed in the county where the mailing occurred. The envelope was placed in the mail at Irvine, California.

**BY CM/ECF NOTICE OF ELECTRONIC FILING:** I electronically filed the document(s) with the Clerk of the Court by using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system. Participants in the case who are not registered CM/ECF users will be served by mail or by other means permitted by the court rules.

**BY FEDEX:** I enclosed said document(s) in an envelope or package provided by FedEx and addressed to the persons at the addresses listed in the Service List. I placed the envelope or package for collection and overnight delivery at an office or a regularly utilized drop box of FedEx or delivered such document(s) to a courier or driver authorized by FedEx to receive documents.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on October 18, 2019, at Irvine, California.

/s/ Lori Gauthier  
Lori Gauthier

**SERVICE LIST**  
**In re Eagan Avenatti, LLP**  
**8:18-cv-01644-VAP-KES**

**BY CM/ECF NOTICE OF ELECTRONIC FILING:**

- **Sara L Chenetz**  
schenetz@perkinscoie.com
- **Ryan Daniel O'Dea**  
rodea@shbllp.com,lgauthier@shbllp.com,sswartzell@shbllp.com
- **Jack Andrew Reitman**  
jareitman@lgbfirm.com,srichmond@lgbfirm.com,jreitman@lgbfirm.com,vrichmond@lgbfirm.com,avedrova@lgbfirm.com
- **John P Reitman**  
jreitman@lgbfirm.com,srichmond@lgbfirm.com,vrichmond@lgbfirm.com
- **James R Selth**  
jim@wsrlaw.net
- **Leonard M Shulman**  
lshulman@shbllp.com
- **Scott Howard Sims**  
ssims@lawfss.com,mnowowiejski@lawfss.com
- **Andrew D Stolper**  
astolper@lawfss.com,mnowowiejski@lawfss.com,astolper@ecf.courtdrive.com
- **Michael Roy Williams**  
mwilliams@bienertkatzman.com,chowland@bienertkatzman.com,4579179420@filings.docketbird.com,admin@bienertkatzman.com

**VIA FIRST-CLASS MAIL:**

Chambers of Honorable Karen E Scott  
Magistrate Judge  
Ronald Reagan Federal Bldg./Courthouse  
411 West Fourth Street, Drop Box, 6<sup>th</sup> Floor  
Santa Ana, CA 92701-4516

Brian Weiss (Receiver)  
Force 10 Partners  
20341 SW Birch Street, Suite 220  
Newport Beach, CA 92660

John P. Reitman/Jack A. Reitman  
Attorneys for Brian Weiss  
Landau Gottfried & Berger  
1801 Century Park East, Suite 700  
Los Angeles, CA 90067

Michael J. Avenatti  
Avenatti LLP  
10000 Santa Monica Blvd  
Los Angeles, CA 90067